

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA, )

Plaintiff, )

v. )

OLUREMI GEORGE, )

a/k/a Victoria Ayoola, )

Defendant. )

INDICTMENT

CR 12-178 JNE/FLN

(42 U.S.C. § 408(a)(7)(A))

(18 U.S.C. § 1001)

(18 U.S.C. § 1542)

THE UNITED STATES GRAND JURY CHARGES THAT:

AT ALL TIMES RELEVANT TO THIS INDICTMENT:

1. The Department of Housing and Urban Development (HUD), the Department of State (DOS), the Department of the Treasury and the Internal Revenue Service (IRS) are agencies within the executive branch of the government of the United States.

2. Pondview Townhomes is a housing development located in Washington County, Minnesota, consisting of forty rental units.

3. Pondview Townhomes provides housing assistance to its residents through the use of a HUD insured mortgage loan, HUD HOME Investment Partnership Program funds, and Low Income Housing Tax Credits (LIHTC).

4. Thirty-five of Pondview's forty rental units are designated as LIHTC units. The townhome located at 435A Woodduck Place is a rental unit within the Pondview Townhomes development and is designated as an LIHTC unit.

5. To be eligible to reside in an LIHTC unit, and receive a reduced monthly rental rate, each calendar year, the resident must

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JUDGMENT ENTD.

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United States v. Oluremi George

sign a certification attesting to, among other things, the number of family members living in the LIHTC unit and the total anticipated annual income for the family residing in that unit.

6. If a resident reports total anticipated annual income above the tax credit income limit, the resident would be ineligible to rent the unit at the reduced rate and would instead be required to pay the higher market rate for the rental unit.

**COUNTS 1-5**

(Social Security Fraud)

On or about the dates set forth below, in the State and District of Minnesota, the defendant,

**OLUREMI GEORGE,**  
a/k/a Victoria Ayoola,

did willfully, knowingly, and with intent to deceive and obtain a thing of value, use Social Security Account Number XXX-XX-1836, assigned to defendant in the name Victoria Ayoola by the Commissioner of Social Security on the basis of false information she furnished to the Commissioner of Social Security as described below:

Count	Date	Description
1	March 1, 2008	Defendant used social security account number XXX-XX-1836 in a tenant income certification form submitted to Pondview Townhomes in support of an application for a low income housing tax credit unit.

United States v. Oluremi George

2	January 13, 2009	Defendant used social security account number XXX-XX-1836 in a tenant income certification form submitted to Pondview Townhomes in support of an application for a low income housing tax credit unit.
3	March 11, 2009	Defendant used social security account number XXX-XX-1836 in an application for a Minnesota Driver's License submitted to Minnesota Driver and Vehicle Services.
4	February 3, 2010	Defendant used social security account number XXX-XX-1836 in a tenant income certification form submitted to Pondview Townhomes in support of an application for a low income housing tax credit unit.
5	January 14, 2011	Defendant used social security account number XXX-XX-1836 in a tenant income certification form submitted to Pondview Townhomes in support of an application for a low income housing tax credit unit.

all in violation of Title 42, United States Code, Section 408(a)(7)(A).

**COUNTS 6-9**

(False Statements)

On or about the dates set forth below, in the State and District of Minnesota, the defendant,

**OLUREMI GEORGE,**  
a/k/a Victoria Ayoola,

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the Executive Branch of the Government of the

United States v. Oluremi George

United States to wit: the Department of Housing and Urban Development, the United States Department of the Treasury, and the Internal Revenue Service, by falsely reporting her anticipated annual income on a tenant income certification form in connection with an application for a low income housing tax credit rental unit. The statement and representation was false because, as defendant then knew, her anticipated annual income exceeded that which she reported in the application as described below:

Count	Date	Description
6	March 1, 2008	Defendant reported anticipated total annual income of \$29,263.00, in her tenant income certification form when in fact her anticipated total annual income for 2008 was to be approximately \$56,400.86.
7	January 13, 2009	Defendant reported anticipated total annual income of \$30,243.00 in her tenant income certification form when in fact her anticipated total annual income for 2009 was to be approximately \$59,668.82.
8	February 3, 2010	Defendant reported anticipated total annual income of \$31,995.00 in her tenant income certification form when in fact her anticipated total annual income for 2010 was to be approximately \$58,633.61.
9	January 14, 2011	Defendant reported anticipated total annual income of \$30,930.00 in her tenant income certification form when in fact her anticipated total annual income for 2011 was to be approximately \$55,887.13.

United States v. Oluremi George

All in violation of Title 18, United States Code, Section 1001.

COUNT 10

(False Statement in Application for Passport)

On or about July 5, 2007, in the State and District of Minnesota, the defendant,

**OLUREMI GEORGE,**  
a/k/a Victoria Ayoola,

did willfully and knowingly make a false statement in an application for passport, with the intent to induce and secure the issuance of a passport under the authority of the United States, for her own use and for the use of another, contrary to the laws regulating the issuance of passports or the rules prescribed pursuant to such laws, to wit: the defendant submitted a passport application claiming to be "Victoria Ayoola" and in such application in response to the question "What other names have you used" the defendant failed to disclose the name, "Oluremi George;" all in violation of Title 18, United States Code, Section 1542.

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON